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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

VS.

RAMON DESAGE

Defendant.

Case No.: 2:13-cr-00039-JAD-VCF

UNOPPOSED MOTION TO TRAVEL AND PROPOSED ORDER

Comes now, Defendant Ramon Desage, by and through his counsel, Richard A. Wright, Esq. and Richard B. Herman, Esq., and hereby moves this Court for permission to travel from Las Vegas, Nevada to Los Angeles, California on Thursday, March 10, 2016 and returning same day. While in Los Angeles, Mr. Desage will be meeting with legal counsel.

On March 7, 2016, Richard B. Herman, Counsel for Mr. Desage, personally discussed this request with Pre-Trial Services Officer Zach Bowen, who advises he consents to this travel request. Mr. Desage will continue with electronic monitoring and will abide by all other bail conditions. Upon his return to Las Vegas, Mr. Desage will give a courtesy call to Officer Zach Bowen.

Counsel for Mr. Desage has discussed this request with Assistant United States Attorney Gregory Damm, who has no opposition to it.

**DATED** this 7<sup>th</sup> Day of March, 2016

Respectfully submitted:

/s/ Richard A. Wright\_

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Attorney for Defendant, Ramon Desage

/s/ Richard B. Herman\_

RICHARD B. HERMAN, ESQ. New York Bar No. 1898758 445 Park Avenue, 9th Floor New York, New York 10022 Telephone: (212) 759-6300 Attorney for Defendant, Ramon Desage

## **ORDER**

This matter having come before the Court on the unopposed motion of Defendant Ramon Desage, and good cause appearing, Defendant's Motion for Permission to Travel to Los Angeles for the day on March 10, 2016 is **GRANTED**.

Dated: March 8, 2016

HONORABLE JENNIFER A. DORSEY

Respectfully submitted by:

WRIGHT STANISH & WINCKLER

/s/ Richard A. Wright

RICHARD A. WRIGHT

RICHARD B. HERMAN, P.C.

/s/ Richard B. Herman\_\_\_\_\_

RICHARD B. HERMAN